

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF KENNETH D. LONG

I, KENNETH D. LONG, declare as follows:

1. I am a member of the Church of Scientology, am employed in a legal affairs department of said Church, and have been assigned to duties requiring that I provide assistance to Church counsel in the present suit since August 1982.

2. On September 3, 1982 I accompanied Mr. John Peterson, a counsel of record for plaintiff Church of Scientology of California (hereafter "CSC"), to the offices of the Clerk of the Court for the Los Angeles County Superior Court. The materials turned over to the court by the law firm of Contos & Bunch, pursuant to a Temporary Restraining Order issued by the Honorable Judge John L. Cole on August 24, 1982 in the case at bar, were brought to Mr. Peterson and I in two sealed "Bekins" boxes. These boxes, which had arrived at the court that morning, had not been opened by anyone and were unsealed for us by one of the personnel in the Clerk's office. Mr. Peterson and I then inspected the entire contents of these boxes page by page. As each item was inspected Mr. Peterson noted it down, compiling an inventory of the materials for his use in this suit.

3. On September 15, 1982 I accompanied Mr. Richard Grey, formerly a counsel of record for CSC, to the Los Angeles County Superior Court. The materials turned over to the Court by Boston attorney Michael J. Flynn pursuant to the above-mentioned Temporary Restraining Order had arrived in court earlier that day, had not been opened by anyone, and were unsealed by one of the personnel in the clerk's office. Mr. Grey and I then inspected the entire contents of these three boxes page by page, completing the first two on September 15, 1982 and returning the following day, September 16, to complete the third box. Each document

1 was again listed on an inventory, this time by Mr. Grey for his use in
2 this suit.

3 4. On November 30, 1982, following a request by Ms. Julia Dragojevic
4 to be allowed to use certain of the above sealed documents in a separate
5 federal suit against CSC and others, I accompanied Church counsel Mr.
6 Walter Cochran-Bond to the Los Angeles County Superior Court where I
7 assisted him in reviewing certain of these materials which had been
8 marked by Ms. Dragojevic.

9 5. On September 8, 1983 I accompanied Mr. Michael Magnuson, a
10 counsel of record for intervener Mary Sue Hubbard in the case at bar, to
11 the Los Angeles County Superior Court to assist him in an inspection of
12 the sealed materials. Mr. Magnuson and I inspected the contents of each
13 box file by file.

14 6. Based on the above inspections of the materials under seal, and
15 on my constant need for reference to the inventories completed during the
16 first two inspections for matters relating to the case at bar, I have a
17 thorough personal knowledge of the materials being maintained under seal.

18 7. As noted above, five boxes of materials were placed in the
19 custody of the Clerk of the Court: two by the firm of Contos & Bunch and
20 three by Mr. Flynn. Broadly speaking, the categories of materials
21 contained in each box at the time of their arrival in court were as
22 follows:

23 Box 1 By Mr. Flynn:

24 a) Xeroxed copies of naval records relating to L. Ron Hubbard.

25 These range from reports of medical examinations to transfer
26 papers to reports on Mr. Hubbard's qualifications as an officer.

27 b) Xeroxed copies of letters between L. Ron Hubbard and his first
28 wife, now deceased, Louise Grubb Hubbard.

- 1 c) Xeroxed copies of letters between L. Ron Hubbard and his parents,
2 both of whom are now deceased.
- 3 d) Xeroxed copies of letters between L. Ron Hubbard and his second
4 wife, Sara Northrup Hubbard.
- 5 e) Xeroxed copies of letters between L. Ron Hubbard and his present
6 wife, Mary Sue Hubbard.
- 7 f) Miscellaneous correspondence to, from or concerning L. Ron
8 Hubbard.
- 9 g) Various writings and manuscripts by L. Ron Hubbard, none of which
10 refer to Scientology or Dianetics or which have any relevance to
11 the instant suit.
- 12 h) Xeroxed copies of investigative reports regarding the death of
13 Mr. Hubbard's son, Quentin.

14 Box 2 by Mr. Flynn:

- 15 a) Taped cassette recordings of meetings between Church represent-
16 atives, their counsel, and counsel for L. Ron Hubbard.
- 17 b) Xeroxed copies of naval records relating to L. Ron Hubbard.
- 18 c) Xeroxed copies of letters between Mr. Hubbard and his present
19 wife, Mary Sue Hubbard.
- 20 d) Original and xeroxed materials concerning legal matters of the
21 late 1950s and early 1960s, including correspondence between
22 Mr. Hubbard and his attorney of that time period.
- 23 e) Original and xeroxed correspondence to, from or relating to
24 L. Ron Hubbard.
- 25 f) Xeroxed copies of internal Church dispatches and memoranda.
- 26 g) Family photographs from approximately 1957.
- 27 h) Xeroxed copies of writings by Mr. Hubbard such as personal
28 journals, poetry, and so forth.

1 Box 3 by Mr. Flynn:

- 2 a) Xeroxed copies of letters between Mr. Hubbard and his present
3 wife, Mary Sue Hubbard.
- 4 b) Original and xeroxed materials relating to legal matters from
5 the early 1950s through the mid-1960s, including correspondence
6 between Mr. Hubbard and his attorneys of the time.
- 7 c) Original correspondence and documents relating to the Hubbard
8 Explorational Company, a company which was active from late
9 1966 until 1975.
- 10 d) The Last Will and Testament of L. Ron Hubbard, and a codicil
11 codicil to that will, dated in 1959 and 1960, both of which
12 are original documents.
- 13 e) Various original and xeroxed internal Church dispatches and
14 memoranda.

15 Box 1 by Contos & Bunch:

- 16 a) Original correspondence from L. Ron Hubbard to his attorney
17 in the late 1950s and early 1960s, Mr. Oscar Brinkman.
- 18 b) Original and xeroxed internal Church dispatches and memoranda.
- 19 c) Original and xeroxed correspondence to, from and concerning
20 L. Ron Hubbard, primarily in the mid- to late-1960s.
- 21 d) Newspaper clippings.

22 Box 2 by Contos & Bunch:

- 23 a) Personal correspondence and documents between L. Ron
24 Hubbard and his present wife, Mary Sue Hubbard, dating
25 from the early 1950s.
- 26 b) Xeroxed copies of correspondence between Mr. Hubbard
27 and other immediate family members.
- 28 c) Original and xeroxed correspondence between Mr. Hubbard

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

and friends and others.

d) Xeroxed copies of writings by L. Ron Hubbard such as
personal journals, poetry, etc.

e) Internal Church dispatches and memoranda, both original
xeroxed, and primarily from the 1960s.

I declare under penalty of perjury that the foregoing is true and
correct.

Executed this 6th day of October 1983 in Los Angeles, California.


Kenneth D. Long